

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

JAY E. LENTZ,	)	
	)	
Petitioner,	)	
	)	
vs.	)	No. 20-CV-204-NJR
	)	
UNITED STATES OF AMERICA,	)	Crim No. 01-CR-150 (EDVA)
	)	
Respondent.	)	

**MOTION FOR EXTENSION OF TIME TO**  
**RESPOND TO PETITION FOR WRIT OF HABEAS CORPUS**  
**PURSUANT TO 18 U.S.C. § 2241**

The United States of America, through its attorneys, Steven D. Weinhoeft, United States Attorney for the Southern District of Illinois, and Laura V. Reppert, Assistant United States Attorney states as follows:

1. On February 21, 2020, Petitioner, Jay E. Lentz, filed a Petition for Writ of Habeas Corpus Pursuant to 28 U.S.C. § 2241. Doc. 1.
2. On May 7, 2020, this Court entered a Memorandum and Order appointing the Federal Public Defender's Office to enter its appearance to evaluate Petitioner's pleading as it relates to *United States v. Davis*, 139 S. Ct. 2319 (2019). Doc. 3.
3. On May 22, 2020, Assistant Federal Public Defender Dan Cronin entered his appearance. Doc. 5.
4. On June 18, 2020, AFDP Dan Cronin filed a motion to withdraw as counsel, stating that he "became aware of a conflict of interest in continuing to represent Petitioner Lentz" and that he believed the "conflict of interest would affect colleagues within the Office of the Federal Public Defender for the Southern District of Illinois" and requested that "substitute counsel for Petitioner Lentz be appointed from outside of that office." Doc. 6.
5. On June 19, 2020, this Court entered a Memorandum and Order granting AFDP Cronin's motion to withdraw. Doc. 7. This Court also stated that because of recent case law developments related to *Davis*, in addition to Petitioner raising claims related to *Mathis v. United*

*States*, 136 S. Ct. 2243 (2016), appointment of new counsel was not warranted. *Id.* It then directed the Respondent to answer or otherwise plead on or before August 3, 2020. *Id.*

6. Respondent requests additional time to review Petitioner's motion and conduct any necessary legal research to prepare a response for this Honorable Court.

7. Undersigned counsel states that this request for an extension of time to respond is not for the purpose of unnecessary delay and is in the interests of justice.

WHEREFORE, the Respondent requests a 60-day extension of time to respond to Petitioner's Petition for Writ of Habeas Corpus Pursuant to 28 U.S.C. § 2241.

Respectfully submitted,

STEVEN D. WEINHOEFT  
United States Attorney

s/ Laura V. Reppert  
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**Certificate of Service**

I hereby certify that on August 3, 2020, I caused to be electronically filed MOTION FOR EXTENSION OF TIME TO RESPOND TO PETITION FOR WRIT OF HABEAS CORPUS PURSUANT TO 28 U.S.C. § 2241 with the Clerk of Court using the CM/ECF system which will send notification to all parties of record.

A copy of this document was mailed by U.S. Mail on August 3, 2020 to the following:

**Jay E. Lentz**  
06569-028  
FCI GREENVILLE  
FEDERAL CORRECTIONAL INSTITUTION  
Inmate Mail/Parcels  
P.O. BOX 5000  
GREENVILLE, IL 62246

Respectfully submitted,

STEVEN D. WEINHOEFT  
United States Attorney

s/ Laura V. Reppert  
LAURA V. REPPERT